

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**DAVID WARREN, et al.,**

**Defendants.**

**CRIMINAL NO. JKB-22-439**

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**MOTION TO EXTEND DEADLINES FOR PRODUCTION  
OF NON-JENCKS DISCOVERY AND FILING OF PRETRIAL MOTIONS**

The Court held a scheduling conference in this matter on May 18, 2023, at the conclusion of which it ordered, first, that the government produce all non-*Jencks* discovery on or before July 3, 2023; and second, that the defendants file any and all pretrial motions on or before October 16, 2023. Through this motion, the government asks the Court to extend both deadlines by 14 days.

Early last week, the government learned that the paralegal assigned to this matter is scheduled to be in trial in *United States v. Williams*, SAG-19-486, between June 8<sup>th</sup> and June 30, 2023. If the Court is amenable, the government would like to give its paralegal an additional two weeks to process the government's final, non-*Jencks* discovery production after the trial is concluded. In fairness to the defendants, the government requests that the pretrial motions deadline also be extended by two weeks, thereby affording defense counsel with the same three-month review/drafting period that the parties originally envisioned.

Counsel for defendants David Warren, Barak Olds, Wayne Prince, and Joshua Duffy have consented to the requested extension. As of this writing, Counsel for defendants Davante Harrison and Tyrell Jeffries have taken no position on the government's request.

Accordingly, for all of the foregoing reasons, the government asks the Court to enter an amended scheduling order, providing that (i) the government shall produce all non-*Jencks*



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 30, 2023, a copy of the foregoing motion was filed electronically with the Court using the CM/ECF system and served using the CM/ECF system via e-mail to all counsel of record.

By: \_\_\_\_\_/s/\_\_\_\_\_

Peter J. Martinez  
Assistant United States Attorney